

**REMARKS**

Claims 1-20 are pending in the present application, of which claims 1, 7, 12 and 17 are independent. After entry of the above amendments, claims 1-20 are pending in the present application, of which claims 1, 7, 12 and 17 are independent. Claims 1, 7, 12 and 17 have been amended. Applicants believe that the present application is in condition for allowance, which prompt and favorable action is respectfully requested.

**I. REJECTION UNDER 35 U.S.C. §102**

The Examiner rejected claims 1-2, 4-5, 7-8, 10, 12, 14, 16-17 and 19 under 35 U.S.C. §102(e) as being allegedly anticipated by U.S. Patent Application Publication No. 2003/0128103 issued to Fitzpatrick et al. (hereinafter "Fitzpatrick"). The rejection is respectfully traversed in its entirety.

To anticipate a claim under 35 U.S.C. §102(e), the reference must teach every element of the claim and "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." (see MPEP §2131).

Fitzpatrick discusses a display with housing having first and second positions to address a need for a multi-position or multi-mode display for a vehicle (See paragraphs [0004] and [0017]). It discloses that the display can display information regarding phone messages received by a wireless phone system integrated within the vehicle (paragraph [0045]). Therefore, Fitzpatrick does not disclose displaying information from a mobile station. Fitzpatrick does discuss that the display may include an input/output port to synchronize with a portable system (paragraph [0046]). Essentially, Fitzpatrick teaches a typical display device for a vehicle that is movable and can sync with a mobile station.

Fitzpatrick does not disclose a display module configured to link with a mobile station to display information from the mobile station when the mobile station is linked with the display

module as in independent claims 1 and 7. Similarly, Fitzpatrick does not disclose enabling display of the information from the mobile station using the display module when the mobile station is linked with the display module as in independent claims 12 and 17.

Since Fitzpatrick does not teach every element of the claims, Applicants submit that independent claims 1, 7, 12 and 17 are allowable over Fitzpatrick. Also, claims 2, 4-5, 8, 10, 14, 16 and 19 depend from and include all the elements cited in the independent claims 1, 7, 12 and 17, respectively. Accordingly, Applicant submits that these claims are believed to be allowable based on their dependency from an allowable base claim as well as other novel features included therein.

For at least the foregoing reasons, Applicants respectfully request a withdrawal of the rejection under 35 U.S.C. §102.

#### IV. REJECTION UNDER 35 U.S.C. §103

The Examiner rejected claims 3, 6, 9, 11, 13, 15, 18 and 20 under 35 U.S.C. §103 as being unpatentable over Fitzpatrick in view of U.S. Patent No. 6,747,574 issued to Butzer et al. (hereinafter "Butzer"). The rejection is traversed for the following reasons.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim elements. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. (MPEP 2143)

Applicants respectfully submit that there is no teaching or suggestion within the art to make the combination proposed by the Examiner. As aptly stated by the Federal Circuit in In re Kotzab, 2000 217 F.3d 1365; 55 USPQ 2d 1313, 1316 (Fed. Cir. 2000):

Most if not all inventions arise from a combination of old elements. Thus, every element of a claimed invention may often be found in the prior art. However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. Rather, to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant.

With respect to claims 3, 6, 9, 11, 13, 15, 18 and 20, the Examiner admitted that Fitzpatrick fails to disclose a display module being build on a windshield and a display module comprising a reflected display, but relied upon Butzer to allegedly cure this deficiency.

Butzer discusses displaying traffic control device information on a display in order to prevent accidents caused by improperly located or obscured traffic control devices (See col. 1, lines 33-37. It disclose displaying the traffic control device information on a vehicle's windshield (col. 8, lines 18-45).

While Butzer teaches displaying traffic control device information on a vehicle's windshield in order to prevent accidents, there is nothing in Butzer that suggests displaying information from a mobile station.

In this instance, the only motivation cited by the Examiner for combining the features of the cited references was that it would be obvious at the time of the invention to include a display module being build on a display module taught by Butzer for the purpose of effectively displaying information of the mobile station. This is insufficient, as a matter of law, because it does not rely on the teachings of the references. Rather, the alleged motivation for making the combination stems from the result of the combination. Since the result of the combination did not exist in the art at the time of Applicant's invention, the result cannot, as a matter of law, form the motivation for the combination in the first instance. Accordingly, Applicant respectfully submits that the Examiner has failed to set forth a prima facie case of obviousness.

The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. In re Mills, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990).

Additionally, even if the references could be combined, which Applicant maintains that they cannot, the resulting combination fails to teach or suggest the claimed subject matter as set forth in independent claims 1, 7, 12 and 17. Specifically, neither Fitzpatrick nor Butzer, separately or combined, teach or suggest display of information from the mobile station using a display module when the mobile station is linked with the display module.

Since claims 3, 6, 9, 11, 13, 15, 18 and 20 depend from and include all the elements cited in the independent claims 1, 7, 12 and 17, Applicants submit that neither Fitzpatrick nor Butzer disclose every element of claims 3, 6, 9, 11, 13, 15, 18 and 20 based on its dependency from the independent claims as well as other novel features included therein.

For at least the foregoing reasons, Applicants respectfully request a withdrawal of the rejection under 35 U.S.C. §103.

Attorney Docket No. 020390

### CONCLUSION

In light of the amendments contained herein, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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